

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Case No. 1:25-cv-04182

SALT-N-PEPA, et al.,

Plaintiffs,

v.

UMG RECORDINGS, INC.,

Defendant.

MOTION FOR LEAVE TO FILE CONSOLIDATED AMICUS CURIAE BRIEF

BY JOSEPH A. REYNA / DREAMS OVER DOLLARS™

TO THE HONORABLE COURT:

Movant respectfully moves for leave to file the attached Consolidated Amicus Curiae Brief. This motion is made under the Court's inherent authority and Fed. R. Civ. P. 7, and is timely, non-duplicative, and of clear public-interest value. See *Jenkins v. Missouri*, 122 F.3d 588, 591 (8th Cir. 1997).

I. IDENTITY AND INTEREST OF AMICUS

Movant: Joseph A. Reyna, pro se and founder of Dreams Over Dollars™, which documents systemic royalty diversion and metadata manipulation.

II. PURPOSE AND VALUE

- Non-duplicative perspective on industry-wide royalty suppression.

- Contextualizes Plaintiffs’ claims within historical patterns of cultural erasure.
- Draws on sealed whistleblower materials, federal notifications, and public disclosures to DOJ, FTC, SEC—and a May 19 2025 Substack post titled “Final Notice: The Royalty System Has Been Exposed.”

III. TIMELINESS & PROCEDURE

Filed promptly upon docketing; no prejudice to any party.

IV. NO UNDUE BURDEN

Concise, limited to context and historical patterns; imposes no discovery duties.

V. CONCLUSION

Leave should be granted to file the attached brief and one-page appendix.

Respectfully submitted,

Dated: May 21, 2025

/s/ Joseph Anthony Reyna

Joseph Anthony Reyna (Pro Se)

Dreams Over Dollars™

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CERTIFICATE OF SERVICE

I certify that on May 21, 2025, I served true and correct copies of the foregoing Motion for Leave, Certificate of Service, Cover Letter, Consolidated Amicus Brief (with Appendix) via ECF on all counsel of record and by U.S. Mail to the Pro Se Intake Unit, SDNY, 500 Pearl Street, New York, NY 10007.

/s/ Joseph Anthony Reyna

Date: May 21, 2025

Via ECF

Pro Se Intake Unit

U.S. District Court, SDNY

500 Pearl Street

New York, NY 10007

Re: *Salt-N-Pepa, et al. v. UMG Recordings, Inc.*, No. 1:25-cv-04182

Motion for Leave to File Consolidated Amicus Curiae Brief

To the Honorable Court:

Enclosed please find my Motion for Leave to File a Consolidated Amicus Curiae Brief, along with supporting documents. I am not a party but wish to provide context on systemic royalty diversions, including my public Substack disclosure on May 19, 2025 (“Final Notice: The Royalty System Has Been Exposed,” available at TinyUrl.com/RoyaltyVault).

Thank you for your consideration.

Respectfully,

/s/ Joseph Anthony Reyna

Joseph Anthony Reyna (Pro Se)

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CONSOLIDATED AMICUS CURIAE BRIEF OF
JOSEPH A. REYNA / DREAMS OVER DOLLARS™
IN SUPPORT OF NEITHER PARTY

I. STATEMENT OF INTEREST

Movant, Joseph A. Reyna, founders Dreams Over Dollars™, tracking metadata suppression, royalty diversion, and institutional distortion. Submitted pro se, incorporating sealed whistleblower exhibits and agency notifications.

II. INTRODUCTION & BACKGROUND

Salt-N-Pepa are cultural architects whose catalog removals implicate more than contracts—they touch on historical erasure of Black women’s creative labor. Plaintiffs allege retaliatory takedowns concurrent with copyright-termination notices; parallel disclosures (including my May 19 2025 Substack post, “Final Notice: The Royalty System Has Been Exposed”) confirm industry-wide royalty siphons under 17 U.S.C. §114(g)(2)(B) and analogous mechanisms.

III. KEY SYSTEMIC OBSERVATIONS

- A. Metadata Suppression
- B. Retaliatory Catalog Removal
- C. Anticompetitive Structures
- D. Regulatory Blind Spots

IV-A. AUTHORITIES SUPPORTING SUBMISSION

Jenkins v. Missouri, 122 F.3d 588 (8th Cir. 1997); *NGV Gaming, Ltd. v. Upstream Point Molate, LLC*, 355 F. Supp. 2d 1061 (N.D. Cal. 2005).

V. EVIDENTIARY RECORD

- Sealed audits, affidavits, metadata logs filed under seal in *Graham v. UMG*;
- Agency notifications to DOJ, FTC, SEC;
- Public Substack disclosure (May 19 2025): “Final Notice: The Royalty System Has Been Exposed,” documenting \$500 million+ in diverted earnings, deceptive “black-box” fund mechanics, and legal vulnerabilities (available at TinyUrl.com/RoyaltyVault).

VI. REQUEST FOR JUDICIAL ACKNOWLEDGMENT

1. Receive this brief and sealed appendices.
2. Acknowledge systemic patterns.
3. Consider referring uncovered harms to regulators if later substantiated.

VII. CONCLUSION

These issues transcend a single contract dispute—they implicate civil-rights dimensions of legacy-preservation for Black women creators. This brief preserves the record for judicial awareness without advocating for any particular claim outcome.

Respectfully submitted,

Dated: May 21, 2025

/s/ Joseph Anthony Reyna

Joseph Anthony Reyna (Pro Se)

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APPENDIX OF AUTHORITIES

Salt-N-Pepa, et al. v. UMG Recordings, Inc., No. 1:25-cv-04182 (S.D.N.Y.)

Statutory Provisions

17 U.S.C. § 203; 17 U.S.C. § 304(c); 17 U.S.C. § 114(g)(2)(B)

Case Law

Jenkins v. Missouri, 122 F.3d 588 (8th Cir. 1997)

NGV Gaming, Ltd., 355 F. Supp. 2d 1061 (N.D. Cal. 2005)

Siegel v. Warner Bros. Entm't Inc., 542 F. Supp. 2d 1098 (C.D. Cal. 2008)

References

Graham v. UMG, No. 1:25-cv-00399 (S.D.N.Y.) – Sealed exhibits

DOJ, FTC, SEC file notifications (confidential)

Public Substack Post: “Final Notice: The Royalty System Has Been Exposed,” May 19 2025

(TinyUrl.com/RoyaltyVault)

This Appendix consolidates controlling authorities and the Substack disclosure without expanding the main brief.